



R.T. Vanderbilt Company, Inc.

INDUSTRIAL MINERALS AND CHEMICALS

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July 21, 2005

Mr. Arthur Neal,
Director, Program Administration
National Organic Program, USDA-AMS-TMP-NOP
1400 Independence Avenue, S.W.
Room 4008-So., Ag Stop 0268
Washington, DC 20250

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ORGANIC PROGRAM
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Subject: Docket number TM-04-07
Petition to Retain Listing on National List of Allowed
and Prohibited Substances, § 205.605(a)
Bentonite

Dear Mr. Neal:

R.T. Vanderbilt Co., Inc., a manufacturer of specialty chemicals and minerals, provides the following comments to the docket for the purpose of retaining the listing of "bentonite" on the National List of Allowed and Prohibited Substances (The National List). Specifically, under section 205.605(a), *Nonagricultural (non-organic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))."*

1. Bentonite (not "synthetic bentonite") is sourced from the earth, thus of natural origin.
2. Bentonite can be processed using water and listed processing aids so that it may remain in compliance with the National Organic Program rules and regulations.
3. Bentonite also provides functionality to aqueous based products as a thickener, clarifier and stabilizer. It is recognized that there are other materials available for these functionalities; however, these are not always of a natural origin nor can they always be processed to organic standards.
4. Bentonite is listed by the US Food and Drug Administration as a Direct Food Substance affirmed as Generally Recognized as Safe (21 CFR 184.1155)
5. Continuing bentonite on the National List preserves the material for its use as an enzyme scavenger in wines certified organic or considered made with organic ingredients.



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6. To remove such an ingredient as bentonite will only result in a provider having to repeat the application for listing process again sometime in the future. This is counter-productive when bentonite has already been established as a material from a natural source, is of low toxicity and is approved as a processing aid in food.

In summary, the National List was appropriately put in place to comply with the Organic Foods Production Act of 1990 and is a necessary part of making the overall National Organic Program viable. Those ingredients currently listed as allowed or prohibited define and maintain the integrity of the program.

Retaining bentonite as one of the allowed ingredients conforms to the intent of the organic program and provides users an ingredient that naturally fits with this intent.

Therefore, R.T. Vanderbilt Co., Inc. petitions the USDA to maintain "bentonite" as an allowed ingredient under Section 205.605(a).

Respectfully submitted,

Frank B. Flynn
Manager, Specialties R&D

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